



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Update the
California Universal Telephone Service
(California LifeLine) Program.

Rulemaking 20-02-008
(Filed February 27, 2020)

FINAL PROPOSAL SUBMITTED BY THE LIFELINE RENEWAL WORKING GROUP

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On behalf of the Renewal Working Group

February 5, 2021

FINAL PROPOSAL FOR RENEWAL PROCESS IMPROVEMENT

In accordance with the *Assigned Commissioner's Scoping Memo and Ruling* ("Scoping Memo") issued on April 13, 2020 and subsequent email Rulings by Administrative Law Judge Wang issued on October 21, 2020 and November 20, 2020, TruConnect Communications Inc., iWireless dba Access Wireless, Global Connections Inc of America dba StandUp Wireless, The Utility Reform Network, the Center for Accessible Technology, The Public Advocates Office at the California Public Utilities Commission, the Small Local Exchange Carriers¹ and AT&T California (collectively, the "LifeLine Renewal Working Group" or "Working Group") submit this Proposal for Improving the Renewal Process ("Proposal").² The Renewal Working Group includes its Proposal in Attachment A.

The Scoping Memo directs parties to form a working group to address the issues regarding improvement of the renewals process. The Scoping Memo further directs the LifeLine Renewal Working Group to "file and serve a proposal to improve the renewals process" sometime during Q4 2020 or Q1 2021. The Renewal Working Group filed its Status Update on December 11, 2020. The Status Update is attached hereto, for reference, as Attachment B. This current Proposal is timely filed.

As discussed in more detail in the Status Update Report, the LifeLine Renewal Working Group began its meetings on July 8, 2020. Pursuant to the Scoping Memo's directions, the LifeLine Renewal Working Group consists of representatives of the following entities:

- TruConnect (Chair)
- iWireless dba Access Wireless
- Global Connections Inc of America dba StandUp Wireless
- The Utility Reform Network
- Center for Accessible Technology
- The Public Advocates Office at the California Public Utilities Commission

¹ The Small Local Exchange Carriers ("Small LECs") consist of the following LifeLine providers: Calaveras Telephone Company (U 1004 C), Cal-Ore Telephone Co. (U 1006 C), Ducor Telephone Company (U 1007 C), Foresthill Telephone Co. (U 1009 C), Happy Valley Telephone Company (U 1010 C), Hornitos Telephone Company (U 1011 C), Kerman Telephone Co. (U 1012 C), Pinnacles Telephone Co. (U 1013 C), The Ponderosa Telephone Co. (U 1014 C), Sierra Telephone Company, Inc. (U 1016 C), The Siskiyou Telephone Company (U 1017 C), Volcano Telephone Company (U 1019 C), and Winterhaven Telephone Company (U 1021 C).

² Pursuant to Rule 1.8(d) of the Rules of Practice and Procedure, the members of the Lifeline Working Group have authorized TruConnect to file and sign this document on their behalf.

- The Small Local Exchange Carriers
- AT&T California

Although the Scoping Memo directed the Working Group to have “equal numbers of representatives” for each category of party- wireline, wireless and consumer/participant advocates- the Working Group agreed to move forward with only two wireline representatives.

The LifeLine Renewal Working Group submits this Proposal for Improving the Renewals Process. The LifeLine Renewal Working Group recognizes that its Proposal represents just one step toward the necessary improvements to the renewals process. As individual stakeholders in the LifeLine Program, each member of the LifeLine Renewal Working Group looks forward to working with the Communications Division Staff, the Third-Party Administrator (“TPA”) and Commission decision-makers to move forward with analysis and implementation of this Proposal. While this is an important first step, it will take further input from additional stakeholders, Communications Divisions Staff, and the TPA to ensure that the state’s most vulnerable customers will stay connected with access to the LifeLine Program.

Dated: February 5, 2021

Respectfully Submitted,

/S/

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ATTACHMENT A

Renewal Working Group Proposal for Improving the Renewals Process

California LifeLine Renewal Working Group
Proposal for Improvements to the Renewals Process

Introduction

Pursuant to the April 13, 2020, Assigned Commissioner’s Scoping Memo and Ruling and to Administrative Law Judge Stephanie Wang’s October 21, 2020 and November 20, 2020 email Rulings, the California LifeLine Renewal Working Group (Working Group) hereby submits this Proposal for Improvements to the Renewals Process (Proposal). The Working Group began meeting on July 8, 2020. The Working Group’s charter is to review the current LifeLine Program renewal process and evaluate strategies and initiatives to improve the process. The Working Group consists of members from consumer advocate groups, as well as wireless, and wireline eligible telecommunication carriers. Specific representatives for these groups are listed below:

- Consumer Advocate Representatives:
 - The Utility Reform Network: Christine Mailloux
 - Center for Accessible Technology: Kate Woodford
 - The Public Advocates Office at the California Public Utilities Commission: Surabhi Karambelkar and James Ahlstedt
- Wireless Representatives:
 - Global Connections Inc of America dba StandUp Wireless: Jason VanArsdall
 - iWireless dba Access Wireless: Sam Bailey
 - TruConnect: Alex Gudkov and Danielle Perry
- Wireline Representatives:
 - Small LECs: Patrick Rosvall and Bill Charley
 - AT&T: Mike Forman

As discussed in its December 11, 2020 Status Update Report, in the months leading up to submitting the Status Update Report, the Working Group discussed and considered many proposals and strategies to improve the renewal process. These ideas were refined into twelve potential recommendations. The Working Group collectively prioritized these recommendations based on their potential impacts on improving the renewal process and determined that five of the recommendations were worthy of further discussion and analysis.¹ This Proposal focuses on those five recommendations. The recommendations are discussed below in a rough order of “impact” that considers the potential number of subscribers that may benefit from the renewals process improvement; yet, as discussed below, the efficacy and final prioritization of each proposal and any specific description of the resulting “changes to program operations” must be further informed by additional comment, data, and analysis of each recommendation. The Working Group submits this Proposal, including a description of each of those five

¹ Of the remaining seven recommendations, the Working Group determined that four recommendations should not be pursued for various reasons and three of the recommendations were already in development with the TPA. Subsequently, the TPA informed the Working Group that another recommendation had been implemented. The Working Group further discusses this recommendation, and the TPA implementation, below.

recommendations, and an indication of whether each improvement requires any adjustments to General Order 153.

The October 21, 2020 email Ruling also directed the Working Group to identify improvements to prioritize for the first half of 2021. However, as discussed in the Status Update Report, and elaborated on further below, the Working Group's Proposal cannot be finalized and implemented without further data and analysis from the Third-Party Administrator (TPA). Working Group members found that they did not have sufficient information regarding the cost, time, and resources necessary to implement each proposal to present a strong prioritization of recommendations. Instead, the Working Group has identified the next steps related to data and analysis in the concluding section of this report that will need to be completed by the Communications Division Staff and the TPA before the proposals are finalized or prioritized.

While the Working Group supports these recommendations and believes that they will significantly improve the renewals process, it is important to note that they do not reflect significant input from the Communications Division Staff or the TPA. After initial meetings of the Working Group, the representatives sought participation from the TPA in at least some of its weekly meetings. Given the TPA's familiarity with the technical systems that are part of the renewal process, and its ongoing work to also address problems with the renewal systems, the Working Group believed it would be more effective and efficient to include the TPA in discussions of proposed recommendations and development of new and unique solutions. With the TPA's participation, the Working Group could have had more active discussions regarding how the recommendations could impact the renewal process along with real-time, critical feedback to allow the Working Group to further refine each proposal, or to develop new proposals through brainstorming and TPA insight. Furthermore, this participation would have also provided the Working Group with timely information on the cost and effort necessary to implement each recommendation, which could have further shaped the recommendations.

The Working Group understood from the Communications Division Staff that the TPA could not attend its meetings due to the press of other priorities as well as a stated desire from Communications Division Staff to avoid any undue influence of the Working Group's deliberations. Therefore, during its meetings, the Working Group gathered questions for the TPA, such as the number of subscribers that may be affected by a specific issue or how a current system or process works and submitted those questions to the TPA through the Communications Division Staff. The aim of these questions was to gauge not only the potential incremental improvement of the various proposals but also the systems constraints, staff effort, and cost associated with implementing the proposals. While the TPA responded to the Working Group's questions throughout this process, those responses were limited and delayed at times. The Working Group believes that the absence of the TPA during its discussions ultimately limited the scope of its work product by impacting the workflow and development of new ideas.

While the members of the Working Group generally support the recommendations in this report, members did not specifically reach consensus regarding specific elements of the recommendations due to their unique and specific considerations for the Program's operation. Furthermore, consensus does not equate to unanimity. Because the Working Group received limited additional information between the Status Update and this Report, each member's individual statements in the Status Update remain relevant here. Member statements and positions are outlined in the Status Update submitted December 11, 2020.

List of California LifeLine Working Group's Recommendations to Improve the Renewal Process

1. THIRD PARTY DATABASE ACCESS

Issue Description:

Access to qualifying program databases would allow the TPA to easily check the database to see if the subscriber continues to be eligible for the program. The Universal Service Administrative Company (USAC) has demonstrated a high percentage of success during the federal renewal period in states with third party database connectivity.

Recommendation:

- Develop access to qualifying program databases, including both state and federal programs, to automatically renew the annual LifeLine benefit under both federal and “state- only” eligibility guidelines.
- Short of automatic renewal or “real time” access, develop access to qualifying program database information that would facilitate renewal process.

General Order 153 Consideration:

This recommendation will require changes to G.O. 153 to allow LifeLine subscribers to consent to TPA access to customer-specific social services information in this new manner. The G.O. will also need to be revised to reflect any type of “automatic” renewal capability in addition to the current renewal process rules currently included in the G.O. This recommendation will also require changes to G.O. 153 Section 5.5 regarding the annual renewal process.

Prioritization:

The Working Group was unable to identify the time, cost, staff resources and possible operational barriers to implement this recommendation. The Working Group has only high-level knowledge of the ongoing efforts by Commission Staff and the TPA to design and implement an eligibility and renewal process based on some type of third party database access. For example, the Working Group recently received information from the TPA that they are in talks with CalFresh to create a “matching agreement,” but the response was very cursory and did not provide the Working Group with sufficient information to update or improve its recommendation. Moreover, the Working Group does not believe access to a single program’s database will be sufficient. Therefore, consideration of this proposal requires significant feedback from the TPA and Communications Division Staff regarding the barriers to adoption and implementation, including pertinent legal barriers and a general understanding of the history and context of this ongoing effort.

The Working Group has consensus that the impact to the program from a successful implementation of this recommendation would be significant. Early in the discussions, the Working Group requested data regarding the results of the renewal process. The response received from Communications Division Staff and the TPA on October 23, 2020 indicated that for the “period reviewed” over 1.2 million wireless and 311,000 wireline renewal forms were sent out, but that only 28% of wireless and only 72% of wireline

subscribers successfully renewed their benefit (excluding successful correctable denials).² In other states where access to program databases exist for recertification processes, wireless carriers see 90% success rates.

2. IMPROVE THE WEB ENROLLMENT SYSTEM (WES) ONLINE RENEWAL PORTAL

Issue Description:

The WES online renewal portal has not been significantly updated in many years. Modernizing this site should provide more user friendly, interactive options, which in turn will help increase successful renewals through this portal. In order to develop the recommendations below, the Working Group's members performed test enrollments and identified issues and areas that needed improvements.

The Working Group understands that the TPA has made some recent incremental changes to the website and the renewal functionalities to make it more "user friendly," but the Working Group has received little information regarding the specifics and status of these updates. The Working Group provides these recommendations with the understanding that they must be coordinated with the ongoing work by the TPA and, ideally, tested and further refined by user focus groups.

Recommendation:

The WES online renewal portal should be modified with the following considerations:

- The WES online renewal portal should be compliant with Web Content Accessibility Guidelines (WCAG) 2.0 AA. The portal should also be formatted to be readable through a desktop and mobile devices.
- Improving the information available on the renewal homepage:
 - On the main renewal homepage, the apply/renew online page title should be changed to only say 'Renew Online.'
 - The Renew Online homepage should include a functional customer support number.
 - The Renew Online should also include a separate line to recover PIN if a subscriber forgets their PIN.
 - The Renew Online homepage should include a link to CPUC's website that hosts a list of all the participating carriers' LifeLine offers.
- Improving the ease of identifying and addressing errors in filling out the renewal form:
 - The system should automatically prompt errors when subscribers type into the online form rather than having to go back and re-click boxes.
 - Error boxes should be formatted for accessibility as the current pink box and red lettering is not clearly visible.
 - The current error system blocks out subscribers after they make 3 errors in any box; can the number of tries be increased? Once customers are blocked out of the system, they are required to identify the issue out of a drop-down list and contact customer service;

² The Working Group notes that the October data response did not describe the dates for the period reviewed. While the TPA's presentation to the ULTS Administrative Committee, dated December 16, 2020, would generally contain updated end-of-year statistics on renewal rates, due to the suspension of the renewal process since May, 2020, the figures in that presentation are not a representative sample.

what is the turnaround time to get support? The drop-down list should have a clear list of errors such as “I made errors on the form and was blocked out.”

- The steps to correct any errors in name/address should be clearly marked on the first page of the online renewal form. The steps should be streamlined to say that “If your personal information is incorrect or has changed, please do the following: 1. Continue filling out this form online. 2. Contact your phone company within 30 days” (the 30 days is based on the information in the eligibility form).
- Improving Eligibility Guidelines document
 - The current 'Eligibility Guidelines' document provided in the renewal form conflates information on the renewal process and eligibility; there should be a separate document that provides details on how to renew.
 - The 'Eligibility Guidelines' document should be simplified; for example, for complicated calculations related to 'income-based' qualification guidelines, examples would be valuable.
 - The 'Eligibility Guidelines' document does not provide information for 'program-based' participation; a list of eligible programs should be provided.
- The last page of the renewal process should provide customers information on how they can check the renewal status or estimated processing time.
- Throughout the renewal form workflow, a prominent HELP button with a customer service number should be added.

G.O. 153 Consideration:

This recommendation does not require G.O. 153 revisions. Although G.O. 153 Section 12.2 provides some subscribers the option of renewing via the “interactive website”, the specifics of the Web Enrollment System are not included in the G.O. 153 provisions.

Prioritization:

The Working Group was unable to identify the time, cost, and staff resources to implement this recommendation and thus to determine the overall benefit from these changes. However, the impact to the program is perceived as being significant with 57.78% of all renewals submitted between 7/1/2019 and 6/30/2020 going through this web portal. The Working Group urges the TPA to provide more detailed descriptions of the current changes it has already made, along with the capabilities of the new Adobe Analytic software that it has deployed to monitor website usage. The TPA’s description should include the cost estimates and staff time to implement those recent changes. The Working Group recognizes that website traffic is down during the renewal suspension but believes the next steps should include an opportunity for the larger LifeLine Working Group, or a smaller “focus” group or workshop, to review the current website form, functions and presentation and the proposed recommendations and present feedback to the TPA. The TPA should then provide concrete and detailed cost estimates for the implementation and ongoing administration of the above recommendations.

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3. IMPROVE THIRD-PARTY ADMINISTRATOR COMMUNICATION WITH SUBSCRIBER

Issue Description:

Communication between the TPA and the subscriber is critical to keep the subscriber engaged and aware of the requirements of the program. Currently SMS and mail are used for this communication. The TPA has agreed to increase SMS messages from two to four for every subscriber, at Day 0, 3, 21, and 35, which the Working Group supports. The TPA has also increased recorded messages about the renewal process for callers to the call center approaching their renewal window. However, there is room for improvement in the overall messaging that will help improve connection between subscriber and program.

Recommendation:

- Increase SMS Communication between TPA and Subscriber at various touchpoints outside of the renewal window including, but not limited to activation and renewal pre-notification. Also provide additional SMS communications, with a link to documents related to the renewal process (e.g., forms sent for correctable denials, requests sent for ID verification, other instances where customer response is needed).
- Increase Interactive Voice Response (“IVR”) communication with customers, especially wireline customers, to more than twice during the renewal process.
- The increase in IVR communication should occur at similar touchpoints listed for SMS communication.

General Order 153 Consideration:

This recommendation does not require G.O. 153 revisions. The detailed timeline for the TPA and the “touchpoints” to the subscribers are not included in the G.O. 153 provisions.

Prioritization:

The Working Group was unable to identify the time, cost, and barriers to implement this recommendation. While the Working Group did receive per-message cost data related to send SMS and pre-recorded, outbound messages, not enough data was provided to determine how many subscribers would have received each message to calculate a proper ongoing cost to the program. Additionally, no information was provided to determine the time it would take to implement this recommendation.

However, the impact of this recommendation to the program is perceived as being significant. The Working Group’s own carrier experience finds that increased communication with the customer improves renewal success rates and supports the idea that making the IVR process more robust will result in easier communications with participants. The purpose of this recommendation is to improve response rates from program participants, to prevent them from entering the correctable denial process or being removed from the program altogether, thereby eliminating the need for subscribers to reapply and the expense of unnecessary new enrollment applications.

4. MODIFY CORRECTABLE DENIAL PROCESS

Issue Description:

When a subscriber receives a correctable denial, they are able to make the correction and send it back to the TPA. Subscribers are currently only allowed one correctable denial, so if an issue is found with the

corrected form that they return, they are not given an opportunity to correct that issue. Currently, a small percentage of customers return the correctable denial form and if a subscriber has a soft or correctable denial, they are not able to correct the issue after day 68 of the 105-day renewal timeline.

Recommendation:

- The TPA and Communications Division Staff should investigate necessary changes to the system that would allow more than one correctable denial during the renewal period and report to the Working Group.
- The TPA and Communications Division Staff should investigate necessary changes to the system that would allow use of text messaging (SMS) and hard copy mailing to send out correctable denial forms/links to include only areas where correction is needed which could perhaps make it easier to fill out and increase the rate of returned forms.
- The TPA and Communications Division Staff should investigate necessary changes to the system to include communication with subscribers via email including correctable denial forms.
- Revise blackout dates for renewal to give subscribers additional time to renew.
 - The blackout date to respond to soft or correctable denial should be changed from Day 68 to Day 86. This accounts for the current average days that a subscriber submits their regular renewal forms late.
 - With this extension in time to address correctable denial errors, the last date for submission of the Identity (ID) Authentication Form should be changed from Day 95 (under the current workflow) to Day 100. This change is recommended to give the TPA and subscriber sufficient time to conduct and respond to the ID Authentication process, should the need arise.

General Order 153 Consideration:

This recommendation does not require G.O. 153 revisions. The detailed timeline for the TPA and the correctable denial process are not included in the G.O. 153 provisions. Currently, G.O. 153 includes reference to the “schedule that the California Lifeline Administrator must adhere to in evaluating an applicant’s or existing subscriber’s qualifications” with a link, but that link is broken.

Prioritization:

With limited access to a TPA resource, the Working Group was unable to identify the time, cost and staff resources necessary to implement these recommended changes to the correctable denial process. Initially, the Communications Division Staff provided data on October 23, 2020, shown in Figure 1 below, regarding how many customers entered the renewal period, successfully navigated the process, how many entered the Correctable Denial process, and the ultimate results.

Figure 1: Correctable Denial Counts During the Renewal Process³

Measure	Wireless Count	Wireless %	Wireline Count	Wireline %	Program Counts	Program %
Renewal Forms Sent Out	1,227,432	79.7%	311,798	20.3%	1,539,230	100%
Successful Renewals	343,714	28.0%	225,941	72.5%	569,655	37.0%

³ Data derived from the October 23, 2020 Staff/TPA response to the Working Group data request.

Correctable Denials Sent	24,523	2.0%	23,294	7.5%	47,817	3.1%
Correctable Denials Returned and Approved	6,396	26.1%	8,632	37.1%	15,028	31.4%
Correctable Denials Returned and Denied	3,529	14.4%	2,208	9.5%	5,737	12.0%
Correctable Denials Unreturned and Denied	14,598	59.5%	12,454	53.5%	27,052	56.6%
Total Successful Renewals	350,110	28.5%	234,573	75.2%	584,683	38.0%

Correctable Denials were sent to 2% of wireless customers and 7.5% of wireline customers going through the renewal process, and of those, 14.4% of the wireless and 9.5% of the wireline customers had Correctable Denials returned and denied. While the number of subscribers receiving denials after returning their Correctable Denials is low, the customers going through the Correctable Denial process have been responsive to the TPA and have taken affirmative action to renew their LifeLine eligibility; thus, it may be that with an additional opportunity, these customers can avoid being removed from the Program. The Working Group urges the TPA to provide feedback to help the Commission determine whether, diversifying the method in which the TPA contacts the customer, including the addition of email, will result in a decrease in the number of Correctable Denials that go unreturned. Further, feedback would be useful to determine if changing the form to “pre-populate” fields so that only the errors need to be corrected will improve renewal rates overall and if extending the Blackout period will provide participants more time to respond and correct any correctable denials that occur.

5. MODIFY BAD ADDRESS PROCESS (TPA Implemented)

Issue Description:

The Working Group initially considered a recommendation to change the process that triggers a “bad address flag” and related “hard denial” upon receipt of hard copy mail that is deemed undeliverable and returned to the TPA. The hard denial caused the LifeLine customer to be removed from the program and the customer was not given an opportunity to renew. However, after the Working Group submitted its December Status Update, the TPA provided feedback in response to a data request that it was no longer creating a hard denial for customers with a “bad address flag.” The TPA further confirmed this decision and provided an explanation of the current “bad address flag” process to the Working Group and to Staff.

For continuity between the Status Update and this Proposal, the Working Group leaves this recommendation intact. Moreover, in addition to the change in the process that will allow records with the “bad address flag” to enter the renewal process, the Working Group wanted to emphasize that the TPA will request that the carrier reach out to these customers to correct the customer’s record and update the address.

Recommendation:

- Revise TPA system so that Bad Address Flag does not result in automatic hard denial before/during the renewal process.
- Use Bad Address Flag to prompt TPA to request service provider to verify current address.
- Discuss with the TPA and Communications Division Staff what options the Program has to communicate with subscribers that have a Bad Address Flag

General Order 153 Consideration:

This recommendation does not require G.O. 153 revisions. The detailed TPA process and timeline are not included in the GO 153 provisions. However, to the extent this recommendation will allow subscribers with a “bad address” to continue on the program until the Anniversary Date, the Working Group urges the G.O. 153 Working Group to review the G.O. provisions, including those that require subscribers to report a “principal place of residence” (Section 5.1) or to inform their provider of any changes to their eligibility (Section 5.6), to ensure the adopted Bad Address Flag process conforms with these provisions or that the provisions are revised to reflect any new processes.

Prioritization:

Upon confirmation from the TPA that it has changed this process, and that the TPA will notify the carriers to reach out to the customer to update the address on the record, the Working Group urges the Commission to remove this recommendation from further consideration.

CONCLUSION AND NEXT STEPS

There is clear and ongoing evidence that the renewal process of the LifeLine Program suffers from low success rates and requires significant improvements. The failure to successfully address the issues with this process has resulted in years of eligible customers being removed from the Program. This Proposal is one step in the direction of improving the renewal process. It represents months of collaborative work by ten stakeholders to review prior feedback and proposals that came from other efforts to address this concern, as well as work to develop new initiatives. Yet, as outlined above, due to the lack of real-time input, concrete data, and cost estimates, much work remains for the Commission’s Division Staff and TPA to complete the prioritization and implementation of the recommendations. In this regard, the Working Group identifies the following next steps to help expedite the implementation of the recommendations.

The Working Group recognizes that parties to this docket will now have an opportunity to comment on the Working Group Proposal. The Working Group urges parties to the LifeLine proceeding to document and address concerns with the renewal process and provide any current data they may have to inform the Communications Division Staff on this issue. The Working Group requests parties to also include questions, concerns, and/or support for the above referenced recommendations, as well as provide any additional recommendations for the Commission to consider. After party comments, the Working Group recommends that the Commission hold a structured and facilitated workshop to discuss these recommendations and the comments. As part of the workshop, the TPA should be required to present additional data and analysis for discussion related to these recommendations. The data and analysis should provide preliminary estimates and insight, at a minimum, on the following questions:

- 1) What are the technical barriers to implementing the recommendations contained in this Proposal?
- 2) What are the time estimates for implementing the recommendations contained in this Proposal?
- 3) What are the cost and staff resources required to implement the recommendation and what resources barriers could arise that would impact or delay implementation?
- 4) What methodologies will be used to measure the effectiveness of each recommendation and over what specific time period (for example data demonstrating the increase in customer traffic

to the WES after new SMS contacts are implemented; the Adobe Analytics showing success rates for renewals after changes to the WES system, etc.)?

In addition, the Working Group includes below a reference to the data request it sent to the TPA on December 17, 2020, after it submitted its Status Update that it believes the TPA and Communications Division Staff will need to gather to have a productive discussion during the workshop and ultimately, move forward with these recommendations. The Working Group believes that detailed and quantitative responses to these questions are needed so that stakeholders can further refine and revise the recommendations, provide a more concrete prioritization, and a more detailed set of next steps. The TPA was unable to provide much of the requested information and, instead, outlined further information it believes it needs and its own “next steps” to provide the information. The Working Group urges the TPA to provide further responses to these questions at the scheduled workshop or be prepared with questions for the workshop participants to further clarify the recommendations so that the TPA can provide the additional information after the workshop.

Data Needs for Part A Recommendations from the Status Update Report

- Allow more than one correctable denial opportunity during the renewal period (time and cost estimate).
- Revise CD form to only include only areas where changes need to be made or to highlight those areas where changes need to be made (time and cost estimate).
- Use of email during the CD process (time and cost estimate).
- Allow return of CD forms up to day 86 (time and cost estimate).
- Change the ID authentication form to day 100 (time and cost estimate).
- Increase “SMS” touchpoints coming from the TPA (time and cost estimate).
- Increase and coordinate IVR messaging with the renewal process milestones and current SMS touchpoints (time and cost estimate).
- Continue research into access into qualifying programs database access to determine eligibility status including, but not limited to, 1.)receiving lists of eligible customers monthly, 2.)confirmation of eligibility or other status information from the third party database, 3.)investigation “database dip” capability to determine eligibility status of individual customers on demand, 4. Coordinating with National Verifier work to gain access to qualifying databases (time and cost estimate).
- Revise “bad address flag” to prompt TPA to request the carrier to contact the customer to verify address, do not automatically issue hard denial for customer with bad address flag prior to renewal period (time and cost estimate).
- Work with Renewal Working Group to make changes to the Web Enrollment System (time and cost estimate).
- Work with Renewal Working Group to make changes to the CPUC website/renewal homepage (time and cost estimate).
- Use of email during the CD process (Does the TPA/CD currently collect subscriber emails at all during the enrollment/renewal process? Does the TPA/CD have any insight/estimate of whether and how many LifeLine subscribers may have an email address?)
- Qualifying programs database access (What factors will need to be considered to ensure consumer privacy? What corresponding systems improvements may be needed to ensure consumer privacy?)
- Improved API interface (What are the consumer protection measures associated with the API?)

Data Needs for Part B Recommendations from the Status Update Report:

- For all changes discussed in Part B. of the Status Update, we would like to request data, including staffing resources and cost data, impact to the contract, etc. for each change.

Finally, based on the discussion during the workshop, Communications Division Staff, with input from the TPA, should release a workshop report with a more detailed and concrete set of proposed changes based on this Report, a proposed prioritization and timeline for implementing the recommendations, and a proposed methodology to measure success and effectiveness. Parties should have a final opportunity to comment. The Working Group requests that the Commission require the Communications Division Staff and TPA to provide quarterly updates to the parties in this proceeding on the status of the implementation and the impact of the recommendations on subscriber renewal rates. The Working Group believes that such an iterative approach may be valuable in revising and improving the renewal process going forward.

ATTACHMENT B

LifeLine Renewal Working Group's December 11, 2020, Status Update Report

California LifeLine Renewal Working Group Status Update Report

Introduction

Pursuant to Administrative Law Judge Stephanie Wang's October 21, 2020 and November 20, 2020 email Rulings, the California LifeLine Renewal Working Group ("Working Group") hereby submits the status update report outlining the potential renewals process improvements under its consideration. Pursuant to the April 13, 2020 Assigned Commissioner's Scoping Memo and Ruling as part of the ongoing Rulemaking 20-02-008, the Working Group was formed and began meeting on July 8, 2020. The Working Group was convened to review the current LifeLine Program renewal process and evaluate suggestions as to how it may be improved. The Working Group consists of members from the wireline, wireless, and consumer advocate groups. Specific representatives for these groups are listed below:

1. Wireline Representatives:
 - Small LECs: Patrick Rosvall and Bill Charley
 - AT&T: Mike Forman
2. Wireless Representatives:
 - Global Connections Inc of America dba StandUp Wireless: Jason Vanarsall
 - iWireless: Sam Bailey
 - TruConnect: Alex Gudkov and Danielle Perry
3. Consumer Advocate Representatives:
 - TURN: Christine Mailloux
 - CforAT: Kate Woodford
 - The Public Advocates Office at the California Public Utilities Commission: Surabhi Karambelkar and James Ahlstedt

The Working Group began the process by creating a matrix with the ideas and recommendations that had been previously discussed in a workshop hosted by the California Public Utilities Commission ("Commission") Communications Division on November 30, 2018. We continued the discussion of each of these items in the matrix as they relate to the impacts that the recommendations could have on the LifeLine renewal process, the cost to implement, the timeline to implement, and concerns each group may have. Through a collaborative process, the Working Group worked to collectively prioritize recommendations based on their potential impacts on improving the renewal process. As discussions were underway, the Working Group determined that some recommendations were being implemented by the LifeLine Program's Third-Party Administrator ("TPA"), Maximus. Consequently, this status update document separates the recommendations considered by the Working Group to improve the renewal process into three categories as follows:

- (Part A) Recommendations not yet implemented;
- (Part B) Recommendations that are currently being implemented by the TPA; and
- (Part C) Recommendations discussed, but not pursued by the Working Group.

Below are the Working Groups' recommendations in each category. The recommendations listed in 'Part A: Recommendations Not Yet Implemented' are listed in order of priority based on their impact on improving the LifeLine renewal process. Each recommendation in Part A and Part B contains a description of the issue, the specific recommendation, and any General Order ("G.O.") 153 considerations. The recommendations listed in Part A and Part B may require adjustments to program administration operations. The recommendations listed in Part C provide a brief discussion of the reasons that the Working Group decided not to pursue the specific recommendations.

Disclaimer: While the members of the Working Group generally support the recommendations in this report, all members did not necessarily reach consensus regarding specific elements of the recommendations due to their unique and diverging positions. Furthermore, consensus does not equate to unanimity. As such, all recommendations include each member's position on the recommendations.

Part A: Recommendations Not Yet Implemented

1. MODIFY CORRECTABLE DENIAL PROCESS

Issue Description:

When a subscriber receives a correctable denial, they are able to make the correction and send it back to the TPA. Subscribers are currently only allowed one correctable denial, so if an issue is found with the corrected form that they return, they are not given an opportunity to correct that issue. Currently, if a subscriber has a soft or correctable denial, they are not able to correct the issue after day 68 of the 105-day renewal timeline

Recommendation:

- Maximus and Communications Division Staff to investigate necessary changes to the system that would allow more than one correctable denial during the renewal period and report to the Working Group.
- Maximus and Communications Division Staff to investigate necessary changes to the system that would allow use of text messaging (SMS) and hard copy mailing to send out correctable denial forms/links to include only areas where correction is needed.
- Maximus and Communications Division Staff to investigate necessary changes to the system to include communication with subscribers via email including correctable denial forms.
- Revise blackout dates for renewal to give subscribers additional time to renew.
 - The blackout date to respond to soft or correctable denial should be changed from day 68 to day 86. This accounts for the current average days that a subscriber submits their regular renewal forms late.
 - With this extension in time to address correctable denial errors, the last date for submission of the Identity (ID) Authentication Form should be changed from day

95 (under the current workflow) to day 100. This change is recommended to give the TPA and subscriber sufficient time to conduct and respond to the ID Authentication process, should the need arise.

G.O. 153 Consideration: This recommendation does not require G.O. 153 revisions. The detailed timeline for the TPA and the correctable denial process are not included in the G.O. 153 provisions. Currently, G.O. 153 includes reference to the “schedule that the California LifeLine Administrator must adhere to in evaluating an applicant’s or existing subscriber’s qualifications” with a link, but that link is broken.

Position of Members:

CforAT: CforAT agrees with the above recommendations to support more than one opportunity to correct a correctable denial. CforAT does not expect this to become burdensome, or costly to the program. CforAT also supports the suggested changes to the blackout dates in support of the correctable denial process.

The Public Advocates Office: While the Public Advocates Office generally supports this recommendation, it has reservations and comments regarding specific elements currently under consideration. Notably, based on existing information provided to the Working Group, the Public Advocates Office does not support an unspecified number of correctable denials since the correctable denial issue affects a small portion of subscribers undergoing renewals. The Public Advocates Office also has reservations regarding the use of email for sending out correctable denial forms/links since this element of the recommendation has received limited discussion in the Working Group on the one hand, and not all subscribers may have access to email, on the other.

TURN: TURN agrees that each of the changes to the correctable denial process as described above could improve the renewal process. TURN supports changing the black out dates and allowing more than one opportunity to submit a correctable denial. However, TURN requires further information regarding the cost and process impacts before moving forward with the recommendations to include email communications capability and to revise the correctable denial form to identify the needed corrections.

Small LECs: The Small LECs support the revision of the blackout dates to extend customers’ renewal window to day 86, provided that the TPA is able to timely process carrier notifications under this accelerated timeframe. The Small LECs also support the recommendation that the TPA and Communications Division Staff investigate the necessary changes to the renewal system, as would be required by this recommendation, but are unable to take a position at this time, regarding correctible denial customer outreach, absent further information regarding costs, customer privacy concerns, and any potential administrative burdens that might be imposed on carriers.

StandUp Wireless: StandUp Wireless supports this recommendation. Minimizing the blackout period as much as possible, and diversifying the mechanisms used to communicate correctable denials especially through text messaging and email should improve renewal rates for qualifying subscribers. Additionally, StandUp Wireless supports extending the ID Authentication process to 100 days if not eliminated entirely; ID Authentication occurs when the subscriber enrolls in the program and should not be necessary for benefit renewal purposes.

iWireless: i-wireless supports this recommendation. i-wireless agrees that TPA should send out a text message alerting customer of correctable denial with a link to fix the correction directly. Many lifeline customers are transient; therefore, never receive the mailed correctable denial form. This is another form of communication that should be sent out to all wireless customers. I-wireless agrees the blackout dates should be revised. Many customers need more time to make corrections and are notified too late. The blackout period should be extended to at least day 86 or more depending on what Maximus believes they can handle. I-wireless agrees the ID Authentication process should be extended to 100 days if it cannot be eliminated. The ID authentication process should only happen when a customer is enrolled in the lifeline program not during the renewal process. What additional value does the ID authentication process offer at renewal. i-wireless would recommend that TPA authenticate the customer at enrollment and receive updates from vendor periodically through life cycle of customer. Identity documentation should not be required during the renewal process.

TruConnect: TruConnect supports this recommendation.

AT&T: AT&T provisionally supports this recommendation.

2. IMPROVE THIRD-PARTY ADMINISTRATOR COMMUNICATION WITH SUBSCRIBER

Issue Description:

The communication between the TPA and the subscriber is critical to keep the subscriber engaged and aware of the requirements of the program. Currently SMS and mail are used for this communication. The TPA has agreed to increase SMS messages from two to four for every subscriber, at Day 0, 3, 21, and 35, which the Working Group supports. The TPA has also increased recorded messages about the renewal process for callers to the call center approaching their renewal window. However, there is room for improvement in the overall messaging that will help improve connection between subscriber and program.

Recommendation:

- Increase SMS Communication between TPA and Subscriber at various touchpoints including, but not limited to, activation, renewal notification, renewal process (e.g., forms sent for correctible denials, requests sent for ID verification, other instances where customer response is needed).
- Increase Interactive Voice Response (“IVR”) communication with customers, especially wireline customers, to more than twice during the renewal process

- The increase in IVR communication should occur at similar touchpoints listed for SMS communication.

G.O. 153 Consideration: This recommendation does not require G.O. 153 revisions. The detailed timeline for the TPA and the “touchpoints” to the subscribers are not included in the G.O. 153 provisions.

Position of Members:

CforAT: CforAT supports the above recommendation as it improves customer retention and reduces the chance of confusion and loss of service to LifeLine customers about where their status is in the renewal process.

The Public Advocates Office: While the Public Advocates Office generally supports this recommendation, it has reservations and comments regarding specific elements under consideration. For example, any additional communication should include consistent messaging across the SMS and Robocall platforms and the communications should include clear actionable steps or a customer service number for the subscriber, wherever possible. Additionally, since the benefit of this strategy needs further assessment and there are added costs associated with this strategy, the Communications Division should assess the effectiveness of increasing communications between the TPA and subscriber before making significant investments on this strategy through the LifeLine fund.

TURN: TURN supports this recommendation, understanding that the messaging and links should be clear, consistent and provide an easy and direct access to the necessary documents.

Small LECs: The Small LECs generally support increased communications between the TPA and program participants during their renewal period, but remain concerned about the implementation of this recommendation with regards to both the cost to the program fund and the authentication protocol that the TPA would need to utilize in order to have wireline carriers permit IVR communications with their customers. As such, the Small LECs are unable to take a position at this time, absent further information.

StandUp Wireless: StandUp Wireless supports this recommendation.

iWireless: i-Wireless supports this recommendation.

TruConnect: TruConnect supports this recommendation.

AT&T: AT&T provisionally supports this recommendation.

3. DATABASE ACCESS

Issue Description:

Access to qualifying program databases would allow the TPA to easily check the database to see if the subscriber continues to be eligible for the program. The Universal Service Administrative Company (USAC) has demonstrated a high percentage of success during the federal renewal period in states with database connectivity.

Recommendation:

- Develop access to qualifying program databases to automatically renew the annual LifeLine benefit.
- Short of automatic renewal or “real time” access, develop access to qualifying program database information that would facilitate renewal process.

G.O. 153 Consideration: This recommendation will require changes to G.O. 153 to allow LifeLine subscribers to consent to TPA access to customer-specific social services information in this new manner. The G.O. will also need to be revised to reflect any type of “automatic” renewal capability in addition to the current renewal process rules currently included in the G.O. This recommendation will also require changes to G.O. 153 Section 5.5 regarding the annual renewal process.

Position of Members:

CforAT: CforAT generally approves the recommendations, however CforAT agrees with TURN about the issue of privacy. Given the current change in the leadership at the national level, this may change.

The Public Advocates Office: While the Public Advocates Office generally supports this recommendation, it has reservations and comments regarding specific elements under consideration. Notably, the Public Advocates Office supports this recommendation as it would fundamentally change the renewal process by minimizing the efforts on part of the subscriber to maintain their LifeLine benefits. However, this recommendation may need long-term efforts and systems improvements and may not be implementable within the timeframe of spring 2021. In addition, this strategy would also require further assessment of measures to ensure subscribers’ privacy. Moreover, even if developing access to qualifying databases is deemed unfeasible, the Commission should still explore strategies to partner with qualifying programs, especially CalFresh and Medi-Cal, to improve communication and outreach about the LifeLine program and renewal process.

TURN: TURN agrees that this recommendation would improve the renewal process. However, before moving forward with the recommendation, TURN requires further information regarding the cost and process impacts, impacts on the TPA process and contracts, along with analysis of necessary privacy protections.

Small LECs: The Small LECs have no position on this recommendation at this time but note that the implementation of any “automatic” renewals may impact customer consent for program enrollment, and an outreach effort by the TPA could potentially impact customer privacy issues.

StandUp Wireless: StandUp Wireless supports this recommendation. StandUp Wireless hopes the CPUC will focus on gaining access to CalFresh and Medi-Cal as those are the most widely used qualifying programs. Additionally, database access would reduce overall cost to administer the program, as less mail would need to be sent, and less correctable denials would be issued.

iWireless: i-wireless agrees with the recommendation. As mentioned above, USAC has gained access to several databases in many states. I-wireless would highly recommend for the CPUC to gain access to Medi-cal and Calfresh programs. These databases would significantly improve the renewal process. Before the national verifier, i-wireless had access to several state databases and some recertifications rates were in the 90% plus range. i-wireless believes by having access to a database would significantly reduce the costs of the program. While there may be some upfront costs to integrate into a database, CPUC would save significantly on outreach to customers. CPUC would not have to mail out recertification packets or messaging them. There are costs sending out recertifications forms as well as costs receiving them by the TPA.

TruConnect: TruConnect supports this recommendation.

4. MODIFY BAD ADDRESS PROCESS

Issue Description:

If hard copy mail is deemed undeliverable and returned to the TPA, the subscriber has a “bad address” flag set on their record which results in an automatic hard denial and the subscriber is unable to renew.

Recommendation:

- Revise TPA system so that Bad Address Flag does not result in automatic hard denial before/during the renewal process.
- Use Bad Address Flag to prompt TPA to request service provider to verify current address.
- Discuss with Maximus and Communications Division Staff what options the Program has to communicate with subscribers that have a Bad Address Flag

G.O. 153 Consideration: This recommendation does not require G.O. 153 revisions. The detailed TPA process and timeline are not included in the GO 153 provisions. However, to the extent this recommendation will allow subscribers with a “bad address” to continue on the program until the Anniversary Date, the Working Group urges the G.O. 153 Working Group to review the G.O. provisions, including those that require subscribers to report a “principal place of residence” (Section 5.1) or to inform their provider of any changes to their eligibility (Section

5.6), to ensure the adopted Bad Address Flag process conforms with these provisions or that the provisions are revised to reflect any new processes.

Position of Members:

CforAT: CforAT is in support of the removal of a hard denial due to a bad address flag. This would improve retention of LifeLine customers. CforAT agrees with CalPA that a request to the TPA and the service provider is a thoughtful step for customers.

The Public Advocates Office: While the Public Advocates Office generally supports this recommendation, it has reservations and comments regarding specific elements under consideration. The Public Advocates Office notes that if the 'Bad Address Flag' system code is generated, it should trigger a request to the TPA and service provider to verify the subscriber's address.

TURN: TURN supports this recommendation, although the Commission, TPA and service providers should institute processes to follow up on bad address flags to avoid significant subsidy payments to providers for ineligible customers.

Small LECs: The Small LECs support the recommendation to eliminate an automatic hard denial based on a bad address flag but want to ensure that the implementation of this recommendation would continue to identify and address any fraudulent enrollment.

StandUp Wireless: : StandUp Wireless supports this recommendation and would add subscribers marked as having a bad address should not be sent mail to reduce unnecessary cost in the program. Subscribers with a bad address must either update and/or confirm their address to receive mail or they may complete the renewal process through web, WES, IVR or any other method available to them that does not require their physical address to correct.

iWireless: i-wireless supports this recommendation. A Lifeline subscriber is very transient customer. They do not always update their address with the carrier. i-wireless agrees that a bad address flag should not be a hard denial failure to the customer. i-wireless does agree that TPA should notify carrier of bad address before renewal process states. However, even if bad address is not corrected by customer, i-wireless believes that the TPA should still proceed with the recertification process via text messaging and email at which time the customer can correct their address at recertification. i-wireless also strongly encourages TPA send out a text message to correct address when bad address flag is found.

TruConnect: TruConnect supports this recommendation.

AT&T: AT&T provisionally supports this recommendation.

5. Improve the Web Enrollment System (WES) online renewal portal

Issue Description:

The WES online renewal portal has not been updated in many years. Subscribers would benefit from modernizing this site and providing more user friendly, interactive options.

Recommendation:

- The WES online renewal portal should be modified with the following considerations:
 - The WES online renewal portal should be Web Content Accessibility Guidelines (WCAG) 2.0 AA compliant. The portal should also be formatted to be readable through a desktop and mobile devices.
 - Improving the information available on the renewal homepage:
 - On the main renewal homepage, the apply/renew online page title should be changed to only say 'Renew Online.'
 - The Renew Online homepage should include a functional customer support number.
 - The Renew Online should also include a separate line to recover PIN if a subscriber forgets their PIN.
 - The Renew Online homepage should include a link to CPUC's website that hosts a list of all the participating carriers' LifeLine offers.
 - Improving the ease of identifying and addressing errors in filling out the renewal form:
 - The system should automatically prompt errors when subscribers type into the online form rather than having to go back and re-click boxes.
 - Error boxes should be formatted for accessibility as the current pink box and red lettering is not clearly visible.
 - The current error system blocks out subscribers after they make 3 errors in any box; can the number of tries be increased? Once customers are blocked out of the system, they are required to identify the issue out of a drop-down list and contact customer service; what is the turnaround time to get support? The drop-down list should have a clear list of errors such as "I made errors on the form and was blocked out."
 - The steps to correct any errors in name/address should be clearly marked on the first page of the online renewal form. The steps should be streamlined to say that "If your personal information is incorrect or has changed, please do the following: 1. Continue filling out this form online. 2. Contact your phone company within 30 days" (the 30 days is based on the information in the eligibility form).
 -
 - Improving Eligibility Guidelines document
 - The current 'Eligibility Guidelines' document provided in the renewal form conflates information on the renewal process and eligibility; there should be a separate document that provides details on how to renew.

- The 'Eligibility Guidelines' document should be simplified; for example, for complicated calculations related to 'income-based' qualification guidelines, examples would be valuable.
- The 'Eligibility Guidelines' document does not provide information for 'program-based' participation; a list of eligible programs should be provided.
- The last page of the renewal process should provide customers information on how they can check the renewal status or estimated processing time.
- Throughout the renewal form workflow, a prominent HELP button with a customer service number should be added.

G.O. 153 Consideration: This recommendation does not require G.O. 153 revisions. Although G.O. 153 Section 12.2 provides some subscribers the option of renewing via the “interactive website”, the specifics of the Web Enrollment System are not included in the G.O. 153 provisions.

Position of Members:

CforAT: CforAT agrees with the recommendations above. Making the WES easier to use, with accurate information, resources for resolving enrollment problems is a top priority. The WES needs to be user-friendly.

The Public Advocates Office: The Public Advocates Office generally supports this recommendation.

TURN: TURN supports this recommendation and urges the Commission staff and TPA to include third parties in the process of updating, reviewing, and designing these changes.

Small LECs: The Small LECs have no position on this recommendation at this time.

StandUp Wireless: StandUp Wireless supports this recommendation.

iWireless: i-wireless supports this recommendation. The WES system has not been modified in years. There should be an easy step by step instructions if the customer has problems in the renewal process.

TruConnect: TruConnect supports this recommendation.

Part B: Recommendations That Are Currently Being Implemented By The Third-Party Administrator, Maximus

The following recommendations were included in the Working Group’s initial discussion list. Subsequently, the Working Group determined that these recommendations, or variations of these recommendations, are in the discussion and design phase or currently being implemented by the TPA. The Working Group includes these recommendations here to provide a comprehensive list of the recommendations discussed over the past several months. The

Working Group believes that no further action is necessary to implement these recommendations, but requests status updates from the TPA and Communications Division Staff regarding the implementation of these recommendations.

1. Improved Application Programming Interface (API) Interface

Issue Description:

Existing Lifeline subscribers do not have a way to renew the eligibility using the carrier's website. In addition, Carriers do not have a way to know if a subscriber who is transferring to them is within the renewal window and could be removed from the program within the next several weeks if the renewal is not successful.

Proposal Currently Being Implemented by the TPA in Coordination with the Carriers:

- API will allow service providers to identify whether a subscriber for whom they are providing service, is in their renewal window, gather the necessary information from the subscriber and send that data to the TPA via an API.
- When subscriber is in their renewal window, and transferring from one carrier to another, the receiving carrier will be able to check the renewal status, gather the necessary information for those subscribers who are within the renewal window, and send that data to the TPA via an API.

These changes have been made by the TPA and are ready to be deployed when the current renewal freeze is lifted.

G.O. 153 Consideration: This recommendation does not require G.O. 153 revisions.

Position of Members:

CforAT: CforAT agrees with the recommendations above, and supports CalPA's concerns regarding "upselling" customers who are transferring or other negative Service Provider behaviors that might not be to the customers benefit.

The Public Advocates Office: While the Public Advocates Office generally supports this recommendation, it has reservations and comments regarding specific elements under consideration. Notably, the Public Advocates Office requires further information on customer protection measures associated with the API interface and stresses the need for such measures so that renewal information is not used for discriminatory treatment or for upselling services to transferring subscribers.

TURN: TURN supports the changes to the current API and acknowledges the work coordinating this effort between staff, carriers and the TPA. TURN also urges the Staff and TPA to consider specific consumer protection and disclosure measures to ensure the LifeLine participant understand the process and requirements through the API. TURN also urges more transparency and communication with other parties to the proceeding, like TURN and other

intervenors, about these significant changes to the program and process flow, especially where these changes are customer-affecting or have the potential to significantly increase budget and expenditures.

Small LECs: The Small LECs support this recommendation.

StandUp Wireless: StandUp Wireless supports this recommendation.

iWireless: i-wireless supports this recommendation.

TruConnect: TruConnect supports this recommendation.

AT&T: AT&T provisionally supports this recommendation.

2. Update Renewal PIN Delivery Methods

Issue Description:

Subscribers are required to enter a PIN provided by the TPA to complete their renewal. Many subscribers either forget or misplace their PIN causing challenges during the renewal process. Below are the methods available today, as well as those that will be implemented in the coming weeks, for a subscriber to retrieve their PIN.

- **Mail** - A subscriber's PIN is provided on page 1 of the renewal form
- **CSR Support** - A subscriber may contact the TPA Call Center or use the "Chat Now" functionality from the public website to request his/her PIN
- **Day 0 and Day 35 text messages** –PIN is visible in the text message delivered to subscribers
- **Day 3 and Day 21 text messages** – messages include embedded PIN that allows subscribers to connect to the public website to complete their renewal without their PINs

Recommendation:

- Revise PIN requirement where the following recommendations are considered:
 - a) allow subscribers to set their own PIN;
 - b) establish functionality such that subscribers can request PIN on demand by SMS or Robocall or call with TPA;
 - c) establish functionality where if a subscriber forgets their PIN, they can authenticate online and then reset PIN.

Current Implementation Plan (Deployment target date 1/14/21):

- **New enrollees: Subscriber sets his/her own PIN** – this delivery method will be facilitated by a text sent to the subscriber upon handset activation where he/she is instructed to respond with his/her desired PIN. If a PIN is not selected by the subscriber,

after a number of days yet to be determined, a system-generated PIN will be sent to the subscriber's LifeLine phone via SMS text

- **Existing subscribers: Subscriber sets his/her own PIN** – existing subscribers will receive a text that will offer them a one-time opportunity to set their own PINs AFTER successfully completing their next renewal. Logic will be added to only send a text upon renewal approval (on Anniversary Date) if the TPA does not have a customer-set PIN on file. If the subscriber has already setup the PIN, the subscriber will not receive this text
- **Existing subscribers – send me my PIN:** From his/her LifeLine phone, subscriber may request his/her PIN be sent to his/her LifeLine phone in real time by text request to a single short code: **345345**

G.O. 153 Consideration: Changes to the PIN requirement will require concurrent changes to G.O. 153, Section 12.2. that provides guidance on where subscribers can find their PIN.

Position of Members:

CforAT: CforAT supports improved PIN processes.

The Public Advocates Office: The Public Advocates Office generally supports this recommendation.

TURN: TURN appreciates that the new processes for the PIN access are currently in discussion and development. TURN supports these new processes as they are currently described, but requests further opportunities to stay informed as the design and implementation processes progress

Small LECs: The Small LECs support this recommendation.

StandUp Wireless: StandUp Wireless supports this recommendation.

iWireless: i-wireless supports this recommendation. The pin is a critical piece to the recertification process that must be made readily available to a customer to recertify. Many customers do not remember their pin; therefore, TPA should have an easy way for a customer to retrieve a new pin on demand.

TruConnect: TruConnect supports this recommendation.

AT&T: AT&T provisionally supports this recommendation.

3. OVER THE PHONE RENEWALS

Issue Description: In April 2018, the Communications Division Staff and TPA instituted a process to allow renewals over the phone for victims of wildfires in certain regions of California. The Working Group discussed expanding this functionality to all LifeLine subscribers during its first few meetings. Since that time, the Working Group understands that the Commission is currently allowing for renewals over the phone of all LifeLine subscribers.

Recommendation:

- Allow renewals over the phone for all LifeLine participants via the TPA.

G.O. 153 Consideration: G.O. 153 will need to be updated to reference the option to renew over the phone through the TPA calling center where it currently notes that renewals can be performed “in writing or online.”

Position of Members:

CforAT: CforAT agrees with the recommendation, and recommends increased transparency from service providers to the program to ensure compliance.

The Public Advocates Office: The Public Advocates Office generally supports this recommendation.

TURN: TURN supports this recommendation but urges the Commission to require more transparency and disclosure of these types of program changes. TURN requests continued and, perhaps, increased, reporting distributed through the service lists and posted on the website of statistics showing the numbers of customers that renew over the phone and the impact on budgets from increased or decreased TPA staff time as a result. TURN also urges discussion regarding the outreach and messaging on the capability to renew over the phone.

Small LECs: The Small LECs generally support this recommendation, provided that telephonic renewals involve sufficient customer authentication and otherwise comply with federal requirements for renewals.

StandUp Wireless: StandUp Wireless supports this recommendation.

iWireless: i-wireless agrees with this recommendation.

TruConnect: TruConnect supports this recommendation.

AT&T: AT&T provisionally supports this recommendation.

Part C: Recommendations Discussed But Not Pursued By The Working Group

1. Differentiate Envelope Colors

Recommendation:

Use different colored paper to clearly distinguish envelopes sent to subscribers to differentiate the renewal form from additional data or correctable denial forms.

Discussion:

- IVR and SMS would need to be updated to educate the consumer to look for the specific color of envelope.
- The financial and manpower resources would be high.
- Could be privacy concerns.
- Unclear benefits or impact on consumer behavior.

Position of Members:

CforAT: CforAT supports not pursuing this recommendation at this time, but CforAT supports the continued use of the current pink envelopes.

The Public Advocates Office: The Public Advocates Office supports not pursuing this recommendation at this time.

TURN: TURN supports not pursuing this recommendation, although TURN also supports keeping the different colored envelope at this time and, consideration, of the messaging on the outside of the envelope to try to make it noticeable (to the extent this is not already happening)

Small LECs: The Small LECs agree that this recommendation should not be pursued at this time.

StandUp Wireless: StandUp Wireless supports not pursuing this recommendation. The Pink Envelopes used today came out of a process where different colored envelopes were sent out, and the pink envelope returned the best results and should continue to be used.

iWireless: i-wireless supports not pursuing this recommendation.

TruConnect: TruConnect supports not pursuing this recommendation.

2. Expand Renewal Period

Recommendation:

Expand renewal period from 104 to 150 days.

Discussion:

- Expanding the renewal period alone will not address the issues with the process.
- Reducing the blackout days during the renewal period will have more of an impact.

Position of Members:

CforAT: CforAT agrees with the working group that this recommendation should not be pursued at this time.

The Public Advocates Office: The Public Advocates Office supports not pursuing this recommendation at this time.

TURN: TURN agrees that the WG should not further consider this recommendation.

Small LECs: The Small LECs agree that this recommendation should not be pursued at this time.

StandUp Wireless: StandUp Wireless supports not pursuing this recommendation.

iWireless: i-wireless agrees to not pursue this recommendation.

TruConnect: TruConnect supports not pursuing this recommendation.

3. Implement bi-yearly renewals

Recommendation:

Implement bi-yearly renewals vs annual cycle

Discussion:

- This would be unfeasible given the current FCC annual renewal requirements.
- Further discussion and analysis regarding impacts on the Lifeline Fund would be required.

Position of Members:

CforAT: CforAT agrees with not supporting this recommendation at this time.

The Public Advocates Office: The Public Advocates Office supports not pursuing this recommendation at this time.

TURN: TURN agrees that the WG should not further consider this recommendation.

Small LECs: The Small LECs agree that this recommendation should not be pursued at this time.

StandUp Wireless: StandUp Wireless supports not pursuing this recommendation.

iWireless: iWireless supports not pursuing this recommendation.

TruConnect: TruConnect supports not pursuing this recommendation.

4. Eliminate Lexis Nexis Check on Renewals

Recommendation:

Eliminate Lexis Nexis check on renewals.

Discussion:

- Data we received indicates that the number of Identity Verification Forms is very limited, and of those issued, there is a high success rate.
- Based on Communication Division's input, it is unlikely that this check can be eliminated.

Position of Members:

CforAT: CforAT agrees with the WG to not support this recommendation at this time.

The Public Advocates Office: The Public Advocates Office supports not pursuing this recommendation at this time.

TURN: TURN agrees that the WG should not further consider this recommendation.

Small LECs: The Small LECs agree that this recommendation should not be pursued at this time.

StandUp Wireless: Based on feedback from the Communication Division, StandUp Wireless supports not pursuing this recommendation

iWireless: iWireless supports not pursuing this recommendation.

TruConnect: TruConnect supports not pursuing this recommendation.

CONCLUSION

The Working Group will continue to meet and work on the final set of recommendations. The Working Group looks forward to discussing the issues and recommendations and other ideas and recommendations that the staff or TPA may have for further consideration.